

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,
Plaintiff

v.

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,
Defendants

C.A. No.: 1:19-CV-10203-IT

**JOINT MOTION OF THE PARTIES TO EXTEND DISCOVERY AND SUBSEQUENT
DEADLINES**

NOW COME the parties in the above-captioned action and hereby move this Honorable Court to amend the current schedule for discovery allowed in this case and all subsequent deadlines. As grounds for this motion, the parties state the following:

1. The Plaintiff Sonya Larson ("Plaintiff") filed this action on January 30, 2019.
2. The Plaintiff filed a motion for leave to amend her complaint on June 28, 2019. The Court granted this motion, and the Plaintiff filed her first amended complaint on July 31, 2019.
3. The Plaintiff filed a second motion for leave to amend her complaint on July 15, 2020, seeking to remove her claim of international interference with contracts and add a claim of intentional interference with advantageous business relationships against the Defendants.
4. The deadline to serve written discovery expired on July 31, 2020. All parties served written discovery within the time allowed by the Court.
5. The Court allowed the Plaintiff's motion for leave to amend her complaint on August 14, 2020, and the Plaintiff filed her second amended complaint on August 16, 2020.

6. In light of the Plaintiff's new claims filed on August 16, 2020, the parties ask the court to extend the written discovery deadline, which expired before the new claims were filed, to allow the parties to serve discovery relevant to these new claims. The parties also request that the subsequent deadlines be extended.
7. The parties request the following tracking order deadlines:

<u>Stages of Litigation</u>	<u>Current Deadlines</u>	<u>Proposed Deadlines</u>
Written Discovery Interim Deadline	07/31/2020	11/02/2020
Alternative Dispute Resolution	08/31/2020	11/30/2020
Fact Discovery Complete		02/28/2021
Plaintiff's Expert Discovery	02/15/2021	03/31/2021
All other expert discovery	03/20/2021	04/30/2021
Dispositive Motions	05/01/2021	06/15/2021
Trial	August 2021	September 2021

WHEREFORE, the parties respectfully request that the Court extend the written discovery deadline in this matter to November 2, 2020, and to extend the remaining deadlines accordingly.

THE DEFENDANTS,
COHEN BUSINESS LAW GROUP, PC,
AND JEFFREY A. COHEN, ESQUIRE,
BY THEIR ATTORNEYS,

/s/ Matthew H. Greene

DATED: September 2, 2020

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THE DEFENDANT,
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BY HER ATTORNEY,

/s/ Suzanne M. Elovecky

DATED: September 2, 2020

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THE PLAINTIFF,
SONYA LARSON,
BY HER ATTORNEY,

/s/ Andrew D. Epstein

DATED: September 2, 2020

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 2nd day of September, 2020.

/s/ Matthew H. Greene